



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

Reply to: 000

December 21, 2012

Mr. Bob Wyatt
Chairman
Lower Willamette Group
c/o Northwest Natural
220 NW Second Avenue
Portland, Oregon 97209

RE: Portland Harbor Superfund Site, Administrative Order on Consent for Remedial Investigation and Feasibility Study: Docket No. CERCLA-10-2001-0240
EPA Supplemental Comments on the *Portland Harbor RI/FS Draft Baseline Ecological Risk Assessment*

Dear Mr. Wyatt:

This letter provides EPA's comments, modifications, and direction to the Lower Willamette Group (LWG) for completing the Baseline Ecological Risk Assessment (BERA) for the Portland Harbor RI/FS. EPA's detailed comments, modifications, and direction are attached.

EPA provided comments to the LWG on July 10, 2012 on the second draft of the *Portland Harbor RI/FS Draft Baseline Ecological Risk Assessment*, submitted and dated July 1, 2011. On September 18, 2012 LWG provided a table with LWG's response to each of EPA's comments. EPA and LWG have been working over the past three months to resolve the issues raised in LWG's response to EPA's July comments. Significant progress was made and EPA believes that both parties now have a good understanding of the work required to address EPA's comments and complete the BERA.

EPA's comments, modifications, and direction to the LWG include the following:

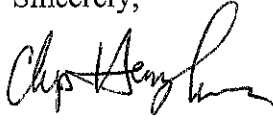
- EPA's modified Executive Summary for the BERA. Please replace the Executive Summary in the draft BERA with EPA's modified Executive Summary, which is attached.
- Comment Resolution Table. The attached table showing EPA's July comments, LWG responses, and comment resolution noted comprise EPA's comments and direction for changes on the individual elements that must be modified to complete the BERA.
- EPA modifications to Section 11 of the BERA. Please replace Section 11 of the BERA with EPA's modified Section 11 that is attached. EPA also expects to provide two summary tables to LWG by January 11, 2013 for inclusion in this section: 1) a table

summarizing ecological risks by assessment endpoints and measurement endpoints, and 2) a table summarizing ecological risks for various media by river mile. Please note that EPA may have additional modifications to the text of the BERA that we expect to provide by January 11, 2013. EPA does not anticipate that additional modifications to the text will require any further revision of the calculations or presentation of the results of the BERA.

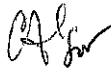
We look forward to working with the LWG on the specific revisions that are needed to address our comments and finalize the BERA. EPA believes it will be most productive to have our respective technical leads work closely together to ensure that the revisions required by these final comments are completed in a timely manner and provide an approvable document. The LWG's deadline for completing the final BERA is March 30, 2013.

If you have any questions, please contact Chip Humphrey at (503) 326-2678 or Kristine Koch at (206) 553-6705. LWG's technical consultants may contact EPA's technical lead for the BERA, Burt Shephard, directly at (206) 553-6359. For legal questions, please contact Lori Cora at (206) 553 1115.

Sincerely,



Chip Humphrey
Remedial Project Manager



Kristine Koch
Remedial Project Manager

Enclosure

cc: Jim Anderson, ODEQ
Rob Neely, NOAA
Ted Buerger, U.S. Fish and Wildlife Service
Brian Cunningham, Confederated Tribes of the Warm Springs
Rose Longoria, Confederated Tribes and Bands of the Yakama Nation
Michael Karnosh, Confederated Tribes of the Grand Rond Community
Tom Downey, Confederated Tribes of the Siletz Indians
Audie Huber, Confederated Tribes of the Umatilla Indian Reservation
Erin Madden, Nez Perce Tribe
Todd Hudson, Oregon Health Authority
Rick Keppler, Oregon Department of Fish and Wildlife
Greg Ulirsch, ATSDR